

Expedited Procedure Under 37 CFR 1.116

Application No. 10/586,277

Paper Dated: August 12, 2011

In Reply to USPTO Correspondence of May 12, 2011

Attorney Docket No. 3135-062115

REMARKS

The final Office Action of May 12, 2011, has been reviewed and the Examiner's comments carefully considered. A copy of a certified translation of priority Dutch Patent Application No. 1025308 is attached to this Amendment. Claim 24 has been amended by way of this Amendment. Accordingly, claims 18-30 are currently pending for examination, with claim 18 being in independent form. Claims 31-34 stand withdrawn.

Rejection Under 35 U.S.C. §112, second paragraph:

Claim 24 stands rejected under 35 U.S.C. §112, second paragraph, for being indefinite because the limitation "the brushing means" lacks antecedent basis and is unclear. Claim 24 has been amended to replace "the brushing means" with "the mechanism connected to the support structure for brushing the surface" as previously recited in claim 23. In view of the foregoing amendments and remarks, reconsideration and withdrawal of this rejection are respectfully requested.

Rejections Under 35 U.S.C. §103(a):

Claims 18-23 and 26-30 stand rejected under 35 U.S.C. §103(a) for obviousness over International Patent Application Publication No. WO 00/20693 to Jacquinet (hereinafter "Jacquinet") in view of German Patent Application Publication No. DE 10327413 to Schulte, et al. (hereinafter "Schulte"). Claims 24 and 25 stand rejected under 35 U.S.C. §103(a) for obviousness over Jacquinet in view of Schulte, in further view of European Patent Application No. EP 0381904 to Ducreux, et al. (hereinafter "Ducreux"). These rejections are respectfully traversed.

The present application is the United States national stage of International Patent Application No. PCT/NL2005/000032, filed on January 17, 2005.

Schulte was published on January 5, 2005. However, Applicant claims priority under 35 U.S.C. §119(a-d) to Dutch Patent Application No. 1025308, which was filed on January 23, 2004. Applicant's priority claim was submitted to the U.S. Patent and Trademark Office upon entry into the United States national stage on July 18, 2006 as indicated in the

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Application Data Sheet filed on that day. A certified copy of Dutch Patent Application No. 1025308 was submitted on June 1, 2008. Acknowledgment of Applicant's priority claim and receipt of the priority document was acknowledged in the Notice of Acceptance of Application Under 35 U.S.C. 371 and 37 CFR 1.495 and the Filing Receipt, both dated June 17, 2008. Attached hereto is a certified translation of Dutch Patent Application No. 1025308 establishing support for the claimed subject matter in the priority Dutch application.

Applicant submits that the current application is entitled to claim foreign priority to the filing date of the Dutch Application, which is January 23, 2004, under 35 U.S.C. §119(a-d). Since Applicant's foreign priority date (1/23/2004) is prior to the publication date (1/5/2005) of Schulte, Applicant submits that Schulte does not qualify as prior art against the present invention under 35 U.S.C. §102(a).

Since Schulte cannot be applied against the present invention as prior art under 35 U.S.C. §102, Applicant submits that further rejection of the claims on the basis of Schulte would be improper and respectfully requests that these rejections be withdrawn.

Conclusion:

Based on the foregoing remarks, reconsideration of the rejections and allowance of claims 18-30 are respectfully requested.

Respectfully submitted,

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